



CITY OF SAN ANTONIO

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July 23, 2020

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SUBJECT: Audit Report of Audit of San Antonio Airport Police Department Operations

Mayor and Council Members:

We are pleased to send you the final report of the Audit of San Antonio Airport Police Department Operations. Management's verbatim response to our recommendations is included in Appendix C of the report. The San Antonio Airport Police Department management and staff should be commended for their cooperation and assistance during this audit.

The Office of the City Auditor is available to discuss this report with you individually at your convenience.

Respectfully Submitted,

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
City of San Antonio

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CITY OF SAN ANTONIO

OFFICE OF THE CITY AUDITOR



Audit of the San Antonio Airport Police Department Operations

Project No. AU18-019

July 23, 2020

Kevin W. Barthold, CPA, CIA, CISA
City Auditor

Executive Summary

As part of our annual Audit Plan approved by City Council, we conducted an audit of the San Antonio Airport Police (SAAPD). The audit objective, conclusions, and recommendations follow:

Determine if Airport Police operations are managed effectively and efficiently to include compliance with training requirements of the State of Texas and the City.

SAAPD needs to improve its administrative processes to better ensure that personnel receive the required training, equipment and supplies are tracked and maintained, access to information systems is authorized and appropriate, complaints against officers are promptly investigated, the screening process for volunteers is adequately documented, and its Standard Operating Procedures (SOPs) are up-to-date and reflect actual practice.

SAAPD has recently taken action to improve its State required documentation of employment files. It also ensures police reports are promptly filed and approved and that weapons not issued to active officers are secured.

We made recommendations to the Police Chief to address these issues, including revising the SOPs, enhancing training and personnel files, providing additional storage capability in the Quartermaster's office, using the inventories to ensure all equipment is maintained, cross-training personnel, purchasing replacement equipment, performing and documenting periodic access reviews, and enhancing spreadsheets and other administrative documentation.

SAAPD Management agreed with the audit findings and has developed positive action plans to address them. Management's verbatim response is in Appendix B on page 13.

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Background

The San Antonio Airport Police Department (SAAPD) is a standalone law enforcement agency of the City of San Antonio. SAAPD is under the control and management of San Antonio Police Department's (SAPD) Chief. An SAPD captain acts as the SAAPD Commander and an SAPD Lieutenant is in charge of Field Operations.

Currently, there are 53 authorized SAAPD employees: 40 Police Officers, six Corporals, five Sergeants, one Lieutenant, and one Administrative Assistant. SAAPD also utilizes volunteers to assist with non-enforcement duties such as enhancing the security of parking, terminal, and traffic areas.

SAAPD officers provide traffic control and enforcement on the airport grounds, assist the Transportation Security Administration (TSA) at checkpoints, respond to calls for service on airport grounds, initiate arrests for violations of laws and ordinances, and investigate suspicious persons, vehicles, burglaries, robberies, and security door alarms. Although not SAPD Officers, SAAPD Officers have the same jurisdiction and law enforcement authority within the City of San Antonio and the State of Texas.

The SAAPD is predominantly funded from the Aviation Fund. The following table illustrates its budgeted expenses for fiscal year (FY) 2019:

Expenditure Classification	FY 2019 Budget
Personal Services	\$4,528,921
Telecommunications	\$346,775
Contractual Services	\$177,557
Commodities	\$71,473
Capital Outlay < \$5000	\$53,529
Other Expenditures	\$27,710
Grand Total	\$5,205,965

Source: SAP

Audit Scope and Methodology

The audit scope was San Antonio Airport Police Department administration from October 2017 to May 2019 with historical information as necessary.

We interviewed staff and reviewed management reports and standard operating procedures (SOPs). We performed tests of: judgmentally selected training and employment records for compliance with state, federal, and city requirements; randomly selected volunteer files; populations of access controls for the SAAPD headquarters building, the Automated Field Reporting (AFR) system, the Records Management System, the Patrol Activity Database, shared directories, and Evidence.com (the body-worn camera and Taser management system); the population of inventory (contents of the Ready Locker, breaching tools, handguns and Tasers® in the Armory, bicycles, rifles, body-worn cameras (BWC), and radios); maintenance of radios, bicycles, and radar units; and the population of complaints for timeliness of completion. Testing criteria included the SAAPD General Manual, SAAPD SOPs, Texas Commission on Law Enforcement (TCOLE) requirements, state and federal regulations, and City Administrative Directives (ADs).

We relied on computer-processed data in the AFR system and the CRASH system to determine if there was a backlog of police reports that had not been submitted or reviewed. Our direct testing included testing user access controls over the AFR system for SAAPD personnel. As the CRASH system is administered by the Texas Department of Transportation, we did not test user access controls for that application. We do not believe that the absence of testing general and application controls had an effect on the results of our audit.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Audit Results and Recommendations

A. Training and Application Files

Required training for SAAPD officers is not consistently tracked and documented and many officers were missing a training class required by the Texas Commission on Law Enforcement (TCOLE) for more than three and a half years.

SAAPD officers must meet a wide variety of training and qualification requirements imposed by SAAPD, the Texas Commission on Law Enforcement (TCOLE), and other state and federal agencies. We noted that after a TCOLE audit early in 2018 identified deficiencies in SAAPD's training and application files, SAAPD assigned a new training officer, sent her to training to become educated on TCOLE requirements, and began remediating those audit findings and generally improving the condition of its training files.

However, we determined that documentation was not available to show that officers had taken required training and that the training unit was not adequately monitoring officers' compliance with applicable requirements. We tested a sample of 12 officers and identified the following:

- All K-9 officers had completed their federally-required certifications, but their certifications were not in their training files.
- There was no documentation showing that nine of 12 sampled officers had taken the mental health refresher course in the last three years, as required by the SAAPD General Manual, Procedure 611.10.B. SAAPD was able to find rosters it had submitted to TCOLE showing that seven of these officers had taken the course in Calendar Year (CY) 2018, but this training was not reflected in the individual officers' training files. Additionally, two officers were not present for the refresher training due to being on administrative leave. These two officers last took this training in CY 2013, indicating that they should have taken it again during CY 2016.
- There was no documentation showing one of the 12 sampled officers had taken the course that is required for officers to submit queries to the Criminal Justice Information Services. SAAPD management was able to pull up the officer's training transcript from TCOLE showing that he had in fact taken this course from an institution other than SAAPD, but the certificate was not in his training file and so SAAPD had not been tracking his compliance with this state- and federally-mandated course.

We also found that five of 12 sampled officers were found to be operating body-worn cameras (BWC) but there was no documentation showing that they had taken the BWC course required by the Texas Occupations Code, Section 1701.656 and TCOLE. SAAPD showed us training rosters indicating four of these officers had taken BWC training in CY 2014, but this training would not have satisfied the requirements that were created in CY 2015. They should have been retrained in October 2015 when the requirements became effective. There was

no evidence to show that the fifth officer had taken any BWC training prior to CY 2019. Thus, none of these five officers (and likely other officers trained in CY 2014) were in compliance with this state requirement for more than three and half years.

Additionally, we tested a sample of six cadets from two different cadet classes from 2018. The two cadets from the December class had all of their training documentation on file. However, for the four cadets from the May class:

- Between one and five Supervisor Weekly Training Reports were missing (out of seven required reports) for all four cadets.
- Three daily reports were missing for one cadet.
- One cadet was missing approval for one learning category on the final checklist, indicating that the Field Training Officer (FTO) was not satisfied that the cadet had met the minimum standards for the area of use of force and the required conference report was not on file to determine why (lack of opportunity vs. poor performance) and what actions the FTO had taken to bring the cadet up to standards.

Finally, two officers did not obtain their Calendar Year (CY) 2018 handgun qualification due to being placed on administrative leave for several months and thus missing their annual in-service training. TCOLE and state regulations require that officers qualify with their handguns each year. The SAAPD General Manual also requires that officers qualify with their handguns each year and may not have their guns reissued if they have not qualified. When these two officers returned from administrative leave to administrative duty in January 2019, they were given their handguns and badges. When this audit revealed that they did not have a current handgun qualification, they were immediately sent to the firing range to qualify. However, due to this oversight, they had possession of their firearms for 89 days without the state required qualification.

Individual officers are responsible for obtaining their required training and turning the certificates in to the training officer; however, this is not always occurring. Furthermore, procedures for effectively tracking all training were not fully implemented. Without such documentation on file, SAAPD cannot ensure that all SAAPD officers have the training required by federal and state laws and regulations as well as its own rules.

Recommendations

The Chief of Police should ensure that:

- The training officer creates a checklist to use in each training file that encompasses all requirements imposed by the SAAPD General Manual and SOPs, as well as all TCOLE and federally or state mandated training.
- A comprehensive review of all officers' training is completed and additional training courses are taken as needed to ensure compliance with all applicable requirements.

- Officers are strongly encouraged to turn in all training certificates to the training officer in a timely manner and the training officer reports any deficiencies in documentation or training in the quarterly training self-audits.
- Its SOPs are updated to ensure that officers returning to duty from any type of extended leave or suspension are qualified to receive all their equipment before returning it to them.
- The department reviews its SOPs and finalizes the training requirements it will enforce. (See also Issue F.)

B. Equipment, Inventory, and Maintenance

Inventory is not accurate and equipment is not being replaced as needed.

SAAPD has a Quartermaster who is responsible for purchasing, maintaining, and distributing all department issued equipment, supplies, weapons and ammunition. We found that he adequately tracks and secures all weapons not issued to officers, ensures that the equipment of personnel who leave the department or who are on extended leave are returned to the department, and retrieves all weapons from personnel that do not pass their weapons qualifications or that go on extended leave or are no longer with the department.

B.1 Inventory and Maintenance

Inventory logs are not complete and accurate and are not used to ensure equipment is maintained as required.

We inspected the Ready Locker, which contains equipment that might be needed by personnel working hours other than 8:00 am – 5:00 pm, such as spare handcuffs, batteries, and replacement parts. The Ready Locker does not contain any weapons. We found that the inventory log listed more equipment and parts for the Ready Locker than were actually present. We also found that utility bars and bolt cutters were stored in locations that were different than the locations identified on the inventory log. We identified a BWC still marked as issued to an employee no longer working for SAAPD, and two old rifles not in use that were not listed on the inventory log.

We noted that the Quartermaster's office is small and cluttered due to a lack of storage space and/or shelving and that obsolete inventory and consumables are not being disposed of in a timely manner. For example, we found a box of old SAAPD uniforms in a storage closet in an airport hangar.

Additionally, we found that two of the 11 SAAPD radar units were not included in the annual 2018 calibration effort by the manufacturer. Furthermore, even though six radars were not on the inventory, five of them were calibrated, indicating that

the inventory was neither complete nor used to ensure that all radar units were maintained as required.

The errors in inventory logs are likely due to several causes. The Quartermaster is responsible for maintaining numerous inventory logs while inventory items are being turned over on a continuous basis (e.g., radios break, get turned in, and a new one is issued). Additionally, the inventory tracking process is manual; serial numbers can easily be entered with typos and can be difficult to read on the equipment. Moreover, the Quartermaster has been on intermittent Family and Medical Leave Act (FMLA) leave and his backup, the Armorer, has been on administrative leave/administrative duty since last September. There is no other backup for this position. We also noted that SAAPD personnel are not well trained in using Microsoft® Excel to perform calculations and use search functions that would be useful in tracking inventory and training records.

If equipment is not properly inventoried and inventory logs are not used to ensure that equipment is maintained on schedule, this equipment may malfunction, its integrity may be questioned, and an environment is created where it is easily lost or stolen.

B.2 Equipment Not Replaced

SAAPD no longer has child safety seats on hand and its nerve agent antidote kits are expired.

The Patrol SOP requires a minimum of three child safety seat systems (two large and one small) to be maintained at the station in good working condition and available to officers twenty-four hours a day. The SAAPD General Manual, Section 615 requires the personal protective equipment kit issued to each officer to contain three nerve agent antidote injector kits. These kits have a shelf-life of five years.

Without child safety seats, officers are unable to transport children under five years of age or 36 inches in height and must call the SAPD Northwest station for assistance. Since persons in the Airport are often travelling with their families and may be arrested for a variety of reasons (such as outstanding warrants, weapons possession, theft, etc.), there may be a need to transport children when a parent is arrested. Additionally, without viable nerve agent antidote injector kits, SAAPD personnel would lack lifesaving treatment in the event of an incident, making it impossible for them to effectively respond.

Recommendations

The Chief of Police should:

- Ensure that inventories are kept up-to-date with all equipment listed.

- Use the equipment inventories to ensure that all equipment has been properly inspected, calibrated where necessary, and maintained as required.
- Dispose of obsolete inventory in a timely and appropriate manner.
- Acquire child safety seats, nerve agent antidote kits, and storage furniture or shelving as appropriate.
- Cross-train another officer to assist the Quartermaster with inventories as needed.
- Provide SAAPD personnel who have administrative duties basic training in Microsoft® Excel to enhance productivity.

C. Complaints

Complaints against officers are not always resolved in a timely manner.

A line complaint is a minor variance from the routine activities and responsibilities of the officer in question. A formal complaint is generally more serious, such as: a significant behavioral infraction; conduct that might constitute a crime; allegations of harassment, discrimination, inappropriate behavior, or racial profiling; or allegations of unnecessary or excessive force. For the audit scope period, there were four complaints carried over from FY 2017 to FY 2018 and in FY 2018, there were 55 new complaints. Between October 1, 2018 and April 3, 2019, there were six complaints. Of these 65 complaints, 42 were line complaints (65%), 16 were formal (25%), and seven (10%) started as line complaints but were escalated to formal complaints.

Multiple people review these complaints and resulting investigative packets, including the accused's Supervisor, Lieutenant, Captain, and the Chief of Police. The range of outcomes from the investigation of all types of complaints shows that the process is working as intended, with conclusions ranging from "unfounded" to the assessing of serious punishments such as suspensions and demotions.

We found that line complaints are, with a few exceptions, processed in a timely manner. Line complaints had a median resolution time of 10 days and a maximum resolution time of 294 days.

However, formal complaints against SAAPD officers are not always processed in a timely manner. Formal complaints took a median time of 91 days and as much as 336 days to resolve. Complaints that start as a line complaint and are subsequently escalated to a formal complaint were resolved in a median of 139 days and a maximum of 206 days. There were also several closed complaints for which we could not calculate the resolution time because the end date was not entered into the log. The SAAPD General Manual and the SAAPD Internal Affairs SOPs require that line complaint investigations be completed in 21 calendar days and formal complaints be completed within 45 calendar days.

SAAPD management considers the current timeliness requirements unrealistic, since complainants are not always available for the investigation due to travel. SAAPD management is working with Human Resources and Park Police (who have similar rules) to identify more realistic goals. Additionally, we noted that the complaint log does not always have a date entered for when the investigative packet is completed and that number of days outstanding is not automatically calculated or logged, which makes it more difficult to ensure that investigations are proceeding promptly. This means that officers are not always being cleared or disciplined in a timely manner.

Recommendations

The Chief of Police should ensure:

- The complaint log is enhanced to include a closed date for each investigation and that the number of days outstanding for each complaint is automatically calculated.
- Justifications for investigations that exceed the current requirements are provided by the investigators and that these justifications are appropriate and documented prior to the SAAPD Commander's periodic review of the caseload.

D. Access Controls

Former employees and employees that are on extended leave (voluntary or not) are not always promptly deactivated from systems and regular periodic reviews of accesses granted are not being performed and/or documented by SAAPD management.

We reviewed access controls for several systems used by SAAPD: the Automated Field Reporting System, the Record Management System, the Patrol Activity Database, Evidence.com (the BWC and TASER system), and SAAPD's shared directories. We also reviewed badge access to the SAAPD Headquarters building. Although most accesses granted included appropriate privileges and were for current employees, we noted a few areas in which SAAPD could improve.

We found that four of eight former employees of SAAPD were not promptly deactivated from Evidence.com. The time taken to deactivate terminated employees ranged from three days prior to termination to 285 days after separation. Additionally, two officers placed on administrative leave for 104 days did not have their access to Evidence.com deactivated. One of those officers did have his privileges reduced, but both should have been placed into the role of "Suspended/Terminated" (which has no privileges) and/or deactivated during their absence. Both actions are easily reversed upon their return to duty.

Administrative Directive (AD) 7-4A requires the revocation of access authorizations upon the voluntary or involuntary termination of any department employee and AD 7-8D requires an employee's access to IT assets be revoked upon separation or the first date of entering into a leave of absence state. These ADs also require periodic screening for inactive accounts. This is because inactive accounts are more susceptible to being misappropriated by wrongdoers.

Additionally, we found that four users who were not SAAPD employees were given access to an SAAPD shared directory. These users worked in other departments but had names that were the same as current SAAPD officers. Although no harm was done, as the shared directory only contained forms, it indicates that regular periodic reviews of access are not being performed. AD 7-8D requires that "Local, physical and/or remote access controls will be periodically reviewed for validity by ITSD, COSA department(s) and or application owners."

There were also two SAAPD officers who were inappropriately given access to a shared directory that contained supervisory materials, such as the logs of which personnel manned the TSA checkpoints, leave and attendance information, self-audits, information related to BWCs, performance appraisals, inspection reports, inventories, and other administrative items.

Finally, although SAAPD conducts annual reviews of access control logs to the SAAPD Headquarters building, this review is not documented. The review is required to maintain access to Criminal Justice Information Services (CJIS). We confirmed that all personnel with access to the building are appropriate.

Recommendations

The Chief of Police should:

- Amend SAAPD procedures for withdrawn employees and those going on extended leave (voluntary or involuntary) to include deactivation of system access in a timely manner.
- Conduct periodic reviews of employee access to information systems and remove users who are not appropriate.
- Ensure that access requests specify employee SAP number and Windows login ID (if different) to prevent confusion as to the correct user.

E. Volunteers in Airport Policing

The personnel files of the Volunteers in Airport Policing program are incomplete and in some cases, non-existent.

SAAPD recruits volunteers to assist with non-enforcement duties such as enhancing the security of parking, terminal, and traffic areas. We tested 10 randomly selected volunteers and found their personnel files all incomplete, if they existed at all. Moreover, the application form used to apply for the volunteer program requests items that are not used in the approval process, such as character references and a driving background check.

SAAPD has been relying on fingerprint checks and background investigations to vet its applicants to the volunteer program, but has not updated its procedures and application instructions to reflect its current practices. It also does not include documentation of the fingerprint checks and background investigation results in files for the volunteers. When such documentation is not retained and periodically inspected, the lack of oversight can result in someone not appropriately processing a volunteer applicant and the applicant could be accepted when they should not be. This could lead to someone gaining access to the SAAPD Headquarters building and other sensitive areas when they should not have such access.

Recommendations

The Chief of Police should ensure that:

- Its application materials and procedures are updated to reflect actual practice.
- Going forward, SAAPD retains documentation reflecting its vetting of the volunteers, including their applications, results of fingerprint checks, results of security clearances obtained via the Airport Badge/ID office, driving record checks (if applicable), and training records.

F. Standard Operating Procedures

SAAPD's SOPs contain unnecessary and outdated material.

We determined that SAAPD SOPs and the General Manual contain out-of-date material regarding equipment no longer used or owned by SAAPD, training that is not being conducted, and out-of-date federal law and regulation references. For example, the Patrol Division SOP, procedure 222.00 entitled "Security Contingency Plan" referenced the Federal Homeland Security Advisory System, which was based on a color-coded threat level which was discontinued in 2011. This system was replaced by the National Terrorism Advisory System which has three alert levels. Despite annual self-audits of the SOPs, this change in national threat advisories was not updated. However, SAAPD management updated the procedure immediately when we brought it to their attention.

Additionally, the Airport TSA Training Requirements SOP, which was last updated in October 2017 contains an appendix that had a copy of federal

regulations¹ that were revised in 2013 (but not in the SOP). The Field Training Officer Program Unit SOP also included a requirement to hold annual FTO training sessions in conjunctions with FTO in-service trainings, which the SAAPD does not hold.

SAAPD could become non-compliant with laws and regulations if it does not keep its SOPs up-to-date. Additionally, when manuals and SOPs become bloated with unnecessary and outdated material, they become that much harder to maintain and are less likely to be followed.

The self-audits we reviewed indicated that not all SOPs were reviewed this past year. Additionally, reviewers are not checking for procedures no longer in use or ensuring that referenced laws and regulations are kept current.

Recommendations

The Chief of Police should:

- Complete its review of any procedures or requirements adopted from the SAPD that need to be modified for SAAPD purposes.
- Eliminate procedures that SAAPD does not intend to follow or that are not applicable.
- Set a realistic review cycle for its SOPs.
- Ensure that periodic updates to SOPs and the General Manual include reviews of changes to referenced federal and state laws and regulations.
- Ensure self-audits of SOPs and the General Manual specify which sections were reviewed and a summary of recommended changes.

¹ 14 CFR Section 139.329 “Pedestrians and ground vehicles.”

Appendix A – Staff Acknowledgement

Mark Bigler, CPA-Utah, CISA, CFE, Audit Manager
Susan C. Van Hoozer, CIA, CISA, Auditor in Charge
Holly Williams, CISA, CRISC, Auditor

Appendix B – Management Response



CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78263-3966

July 6, 2020

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
San Antonio, Texas

RE: Management's Corrective Action Plan for the San Antonio Airport Police Department Operations Audit

SAAPD has reviewed the audit report and has developed the Corrective Action Plans below corresponding to report recommendations.

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
1	Training and Application Files The Chief of Police should ensure that: <ul style="list-style-type: none"> The training officer creates a checklist to use in each training file that encompasses all requirements imposed by the SAAPD General Manual and SOPs, as well as all TCOLE and federally or state mandated training. A comprehensive review of all officers' training is completed and additional training courses are taken as needed to ensure compliance with all applicable requirements. Officers are strongly encouraged to turn in all training certificates to the training officer in a timely manner and the training officer reports any deficiencies in documentation or training in the quarterly training self-audits. Its SOPs are updated to ensure that officers returning to duty from any type of extended leave or suspension are qualified to receive all their equipment before returning it to them. The department reviews its SOPs and finalizes the training requirements it will enforce. 	4	Accept	Captain Paul Biasioli / Airport Police Commander	September 1, 2019 SOPs: July 1, 2020

Appendix B – Management Response (cont.)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	<p><u>Action plan:</u></p> <ul style="list-style-type: none"> The Training Section Sergeant has developed a spreadsheet that tracks all mandated training, to include training required by TCOLE, General Manual, Standard Operating Procedures (SOPs), and any other mandated/required training. Training requirements and status will be monitored and reviewed by Airport Police Commander quarterly to ensure training compliance of each airport police officer. In addition to this report, the TCOLE system will be monitored quarterly to ensure officers are compliant with required training. Officers will be required to submit training certificates and all other documentation to the Training Section within 5 business days of completion of training. A training tracking system had been identified. It is anticipated that this system will be included in the FY21 Airport Department's budget subject to City Council approval. The Training Section Sergeant has completed the comprehensive review of all officers' training files. All officers were found to be up to date on all mandated training. During the Audit two officers were on extended leave. Prior to returning to regular duty status, one officer retired and the second officer has obtained all mandated training as part of the Return to Duty program. The Training Section will ensure all officers returning to duty from extended leave or suspension complete the Return to Duty program and that all requirements are met prior to the officer being released to full duty. Additionally, the Training Section will ensure the returning officer is qualified to be issued and to carry their Department issued weapon. The Airport Police SOPs have been updated. These documents are available to all members on the Department's shared access drive. Targeted SOP training will begin in July 2020 and will be completed prior to September 1, 2020. All officers, after completing the training, will sign an acknowledgement form that will be placed in each member's training file. The Department has created a spreadsheet that references all policies/procedures tracking when each policy/procedure was last reviewed and/or revised. 				

Appendix B – Management Response (cont.)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
2	<p>Equipment, Inventory, and Maintenance</p> <p>The Chief of Police should:</p> <ul style="list-style-type: none"> • Ensure that inventories are kept up-to-date with all equipment listed. • Use the equipment inventories to ensure that all equipment has been properly inspected, calibrated where necessary, and maintained as required. • Dispose of obsolete inventory in a timely and appropriate manner. • Acquire child safety seats, nerve agent antidote kits, and storage furniture or shelving as appropriate. • Cross-train another officer to assist the Quartermaster with inventories as needed. • Provide SAAPD personnel who have administrative duties basic training in Microsoft® Excel to enhance productivity. 	6	Accept	Captain Paul Biasioli / Airport Police Commander	November 1, 2019

Appendix B – Management Response (cont.)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	<p>Action plan:</p> <p>The Quartermaster has completed a comprehensive review of all inventory lists and has verified them for accuracy and completeness. To assist with the maintaining the inventory list up-to-date an inventory tracking system has been identified. It is anticipated that funding for this system will be included in the FY21 Airport Department's budget subject to City Council approval.</p> <ul style="list-style-type: none"> The Quartermaster ensures all equipment, to include vehicles, is inspected, calibrated and maintained. This is an on-going process and is documented in the self-audits. All Department owned equipment and vehicles have been inspected and where required, calibrated, to include all portable and mounted radar units. All Department owned equipment and vehicles have been adequately maintained and will continue to be maintained. The Department has already started and continues to properly dispose of obsolete and unneeded and surplus inventory, equipment and consumables. The management of these items is a continuous job responsibility of the Quartermaster. Some items identified in the audit, such as uniforms and similar equipment, were still very new and will be maintained for issuance to officers as needed. The child safety seats have been purchased and are available for use as needed. The DuoDote injectors have also been purchased and issued to the officers. We have acquired additional shelving from the Aviation surplus storage and it has been moved to our storage areas. Additional storage containers will be purchased as needed to assist in the storage of the Departments equipment and inventory. The Department had two additional officers who were cross-trained to assist the Quartermaster with his duties and could have performed his job functions in his absence. However, during the audit, both of these individuals were on extended Admin Leave/Duty. One of the two previously cross-trained officers separated from the department and the other will no longer be utilized in that capacity. The Department has cross-trained another officer to assist the Quartermaster when needed. Additionally, the newly selected Training Sergeant, will be cross-trained to assist with the quartermaster duties. The Department identified several key administrative personnel who would benefit from additional computer training. These individuals have already attended an outside Microsoft Excel training course. Additionally, they are being scheduled to attend the Microsoft Excel training course offered by the City. The Department will continue to find additional sources of training to better prepare our staff to perform their job responsibilities. The Department placed an officer on special assignment to assist the Quartermaster with the comprehensive review and revisions of the Department's inventory lists. During this special assignment, the officer was also cross trained to assist with the quartermaster job responsibilities. This officer has previous experience with similar job functions from the military. As previously stated, the newly selected Training Sergeant will also be cross trained to assist with the job responsibilities. The Department purchased a storage building which is primarily meant to kennel the Department's canines; however, we will also utilize this building to provide additional storage for the Department's equipment and inventory. 				

Appendix B – Management Response (cont.)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
3	<p>Complaints The Chief of Police should ensure:</p> <ul style="list-style-type: none"> The complaint log is enhanced to include a closed date for each investigation and that the number of days outstanding for each complaint is automatically calculated. Justifications for investigations that exceed the current requirements are provided by the investigators and that these justifications are appropriate and documented prior to the SAAPD Commander's periodic review of the caseload. 	8	Accept	Captain Paul Biasioli / Airport Police Commander	August 16, 2019
	<p>Action plan:</p> <ul style="list-style-type: none"> The Internal Affairs complaint log has been updated so that it is easier to read and follow. The complaint log had a closed out date previously, but at times due to the process, the date wasn't added. The Internal Affairs Investigator will ensure the submitted for review date is entered upon submission from the investigator/supervisor. The Internal Affairs Investigator will also ensure the close out date is entered upon closure of the complaint. The Internal Affairs Investigator will attend the Microsoft Excel class, previously mentioned, in order to expand the capabilities of the complaint log. Prior to the Audit, the Department was already in the process of trying to find and acquiring a computer software program to assist in tracking the Department Internal Affairs' cases and complaints. A system has been identified. It is anticipated that this system will be included in the FY21 Airport Department's budget subject to City Council approval. The Internal Affairs Investigator is including justification on any Internal Affairs case that exceeds the timelines in General Manual Procedure 303. Airport Police, Park Police and Human Resources have updated General Manual Procedure 303, to include increasing the timeframes allotted for complaint investigations. Our recommended timeline revisions are less stringent than current timelines and are more in line with the timelines utilized by SAPD. Our recommended revisions have been approved by Human Resources and been forwarded to the Chief's Office for review. Airport Police worked with Human Resources to create an in-lieu position for an Internal Affairs Sergeant. An Internal Affairs Sergeant has been hired. Case load and investigation complexity require an individual with a primary responsibility of case investigation. This position will address several of the identified issues listed in the Audit. 				

Appendix B – Management Response (cont.)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
4	<p>Access Controls The Chief of Police should:</p> <ul style="list-style-type: none"> Amend SAAPD procedures for withdrawn employees and those going on extended leave (voluntary or involuntary) to include deactivation of system access in a timely manner. Conduct periodic reviews of employee access to information systems and remove users who are not appropriate. Ensure that access requests specify employee SAP number and Windows login ID (if different) to prevent confusion as to the correct user. 	9	Accept	Captain Paul Biasioli / Airport Police Commander	September 1, 2019
	<p>Action plan:</p> <ul style="list-style-type: none"> The Department has created a checklist that includes all computer systems the employees have been given access to. When an employee resigns, is terminated, or placed on extended leave, the Training Section will utilize the checklist to ensure the employee's access has been terminated from all systems. The Training Sections will request confirmation emails stating access has been deactivated. Once all deactivations have been confirmed, the Training Section will provide the checklist and confirmation documentation to the Administrative Lieutenant to verify. The checklist and confirmation documentation will then be placed in the employee's training file. On an annual basis the Administrative Lieutenant will request a list of all employees who have access to the computer systems utilized by the Department. The Lieutenant will conduct a review of these lists to ensure our employees only have access to approved systems and that no unauthorized user has access to any Departmental systems or drives. The Department's checklist of utilized computer systems will be used when an employee is promoted or a new employee is hired. The Training Section will utilize the checklist to ensure the employee's has been given access to the proper systems. The Training Sections will include the employee's SAP number and Windows login ID (if applicable) with the request for access. The Training Section will request confirmation emails stating access has been activated. Once all activations have been confirmed the Training Section will provide the checklist and confirmation documentation to the Administrative Lieutenant to verify. The checklist and confirmation documentation will be placed in the employee's training file. 				

Appendix B – Management Response (cont.)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
5	Volunteers in Airport Policing The Chief of Police should ensure that: <ul style="list-style-type: none"> • Its application materials and procedures are updated to reflect actual practice. • Going forward, SAAPD retains documentation reflecting its vetting of the volunteers, including their applications, results of fingerprint checks, results of security clearances obtained via the Airport Badge/ID office, driving record checks (if applicable), and training records. 	10	Accept	Captain Paul Biasioli / Airport Police Commander	September 1, 2019
Action plan: <ul style="list-style-type: none"> • The Volunteers in Airport Policing application process was reviewed. At this time no revisions are being made. However, all requested materials will be used in the vetting and approval process, to include their driving record. • The Department will retain all documentation required in the vetting and approval process for all volunteers. The minimum documentation in a volunteer's folder will include their application, a local warrant return, a copy of their Driver's License, a copy of their driving record, an email confirming they have completed and passed their finger print check and the SAT Airport Badge and ID security check, as well as the SAT Badging requirements. A thorough vetting of all volunteers has always been the policy of the SAAPD and no volunteer is issued a SAT Badge or allowed access to the SAAPD or other sensitive areas without having passed all background and badging requirements. 					
6	Standard Operating Procedures The Chief of Police should: <ul style="list-style-type: none"> • Complete the review of any procedures or requirements adopted from the SAPD that need to be modified for SAAPD purposes. • Eliminate procedures that SAAPD does not intend to follow or that are not applicable. • Set a realistic review cycle for its SOPs. • Ensure that periodic updates to SOPs and the General Manual include reviews of changes to referenced federal and state laws and regulations. • Ensure self-audits of SOPs and the General Manual specify which sections were reviewed and a summary of recommended changes. 	11	Accept	Captain Paul Biasioli / Airport Police Commander	July 1, 2020

Appendix B – Management Response (cont.)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	<p>Action plan:</p> <ul style="list-style-type: none"> A comprehensive review of all SOPs has been completed and all necessary revisions have been made as of July 1, 2020. As part of the review, any procedure or portions of a procedure which did not apply to SAAPD were removed from the SOP. The Department worked with Human Resources to create an in-lieu a position for an Internal Affairs Sergeant. In addition to investigating Internal Affairs cases and complaints, the Sergeant will be tasked with ensuring the General Manual and SOPs are being reviewed and revised on a continuous basis, with each procedure and/or policy being reviewed on an annual basis. An annual review of policies and procedures will also be conducted by the appropriate section or unit as part of their self-audits. These self-audits will specify which policy or procedure was reviewed and a brief summary of any suggested revisions. To ensure compliance with the recommendation, the Department has created a spreadsheet to track policy/procedure reviews and revisions. The spreadsheet will make it easy to track the reviews and revisions of all policies and procedures. As part of the review process, the member reviewing the policy/procedure will also review all referenced federal, state and city laws, as well as any regulations referenced in the procedure. As stated above, the self-audits of the SOPs will also include which section, policy or procedure was reviewed. If any revisions were made a brief summary of the revisions will also be included in the self-audit. 				

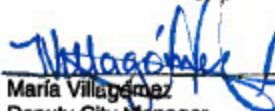
We are committed to addressing the recommendations in the audit report and the plan of actions presented above.

Sincerely,



William P. McManus
Chief of Police
San Antonio Police Department

6 Jul 20
Date



Maria Villagomez
Deputy City Manager
City Manager's Office

7/8/2020
Date